

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
IMIR REAVES,	:	VIOLATIONS:
a/k/a Imir H. Reaves,		18 U.S.C. § 1951 (interference
a/k/a Imir Burton,	:	with interstate commerce by robbery - 1
a/k/a Imir Robert Burton,		count)
a/k/a Imir Sanchez,	:	18 U.S.C. § 924(c) (carrying and
a/k/a Imar Sanchez,		using a firearm during and in relation to
a/k/a Amir Sanchez,	:	a crime of violence - 1 count)
a/k/a Amir Husan Sanchez,		18 U.S.C. § 922(g)(1) (felon in possession
a/k/a Imer Birdon,	:	of firearm - 1 count)
a/k/a Thomas Moore,		Notice of forfeiture
a/k/a Dalmir Larkins,		
a/k/a Ross.		

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times relevant to this indictment, the Empire Diner was engaged in and affecting interstate commerce by providing food and drink, and goods and services, which were produced and transported from other states to Pennsylvania, to residents of the Commonwealth of Pennsylvania and out-of-state residents.

2. On or about April 21, 2007, in or near Upper Darby in the Eastern District of Pennsylvania, defendant

**IMIR REAVES,
a/k/a Imir H. Reaves,
a/k/a Imir Burton,
a/k/a Imir Robert Burton,
a/k/a Imir Sanchez,
a/k/a Imar Sanchez,**

**a/k/a Amir Sanchez,
a/k/a Amir Husan Sanchez,
a/k/a Imer Birdon,
a/k/a Thomas Moore,
a/k/a Dalmir Larkins,
a/k/a Ross,**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant REAVES unlawfully took and obtained, cash and other items from the person or in the presence of employees and patrons of the Empire Diner, and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, by brandishing a firearm, pointing a firearm at the employees and patrons and demanding money.

In violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 21, 2007, in or near Upper Darby, in the Eastern District of Pennsylvania, defendant

**IMIR REAVES,
a/k/a Imir H. Reaves,
a/k/a Imir Burton,
a/k/a Imir Robert Burton,
a/k/a Imir Sanchez,
a/k/a Imar Sanchez,
a/k/a Amir Sanchez,
a/k/a Amir Husan Sanchez,
a/k/a Imer Birdon,
a/k/a Thomas Moore,
a/k/a Dalmir Larkins,
a/k/a Ross,**

knowingly used and carried a firearm, that is, an IMEZ Makarov, Model IJ70-18A, 9mm semiautomatic pistol, with an obliterated serial number, loaded with six CCI 9x18 mm Makarov cartridges, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with interstate commerce by robbery, in violation of Title 18, United States Code, Section 1951(a).

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 21, 2007, in or near Upper Darby, in the Eastern District of Pennsylvania, defendant

**IMIR REAVES,
a/k/a Imir H. Reaves,
a/k/a Imir Burton,
a/k/a Imir Robert Burton,
a/k/a Imir Sanchez,
a/k/a Imar Sanchez,
a/k/a Amir Sanchez,
a/k/a Amir Husan Sanchez,
a/k/a Imer Birdon,
a/k/a Thomas Moore,
a/k/a Dalmir Larkins,
a/k/a Ross,**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, an IMEZ Makarov, Model IJ70-18A, 9mm semiautomatic pistol, with an obliterated serial number, loaded with six CCI 9x18 mm Makarov cartridges.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 924(c) and 922(g)(1), set forth in this indictment, defendant

**IMIR REAVES,
a/k/a Imir H. Reaves,
a/k/a Imir Burton,
a/k/a Imir Robert Burton,
a/k/a Imir Sanchez,
a/k/a Imar Sanchez,
a/k/a Amir Sanchez,
a/k/a Amir Husan Sanchez,
a/k/a Imer Birdon,
a/k/a Thomas Moore,
a/k/a Dalmir Larkins,
a/k/a Ross,**

shall forfeit to the United States of America, the firearm and ammunition involved in the commission of these offenses, including, but not limited to:

one IMEZ Makarov, Model IJ70-18A, 9mm semiautomatic pistol, with an obliterated serial number and six CCI 9x18 mm Makarov cartridges.

All pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**